

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: Michael W. Monaghan, Jr.
a/k/a Michael W. Monaghan
a/k/a Michael Monaghan,

Debtor

CHAPTER 7 PROCEEDING

CASE NO. 20-12239-JDW

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM
AUTOMATIC STAY AND FOR OTHER RELIEF**

COMES NOW, Debtor, Michael W. Monaghan, Jr., by and through his attorney, James W. Amos, and by way of response to the motion for relief from automatic stay and for other relief filed by Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage, (hereinafter "Creditor") and would show unto the Court as follows:

1. Debtor admits the allegations contained in paragraph I of the motion.
2. Debtor admits the allegations contained in paragraph II of the motion.
3. Debtor admits the allegations contained in paragraph III of the motion.
4. Debtor denies the allegations contained in paragraph IV of the motion. On August 8, 2022, Debtor paid \$8,692.09 to the Creditor and was given a confirmation number (22178463) for said payment.

5. Debtor denies the allegations contained in paragraph V of the motion.

NOW, having fully responded to the motion for relief from automatic stay and for other relief filed by the Creditor, Debtor prays that said motion be denied.

Respectfully submitted,

/s/ James W. Amos
JAMES W. AMOS MSB #1559
ATTORNEY FOR DEBTOR
2430 CAFFEY ST.
HERNANDO, MS 38632
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of August, 2022, a copy of the foregoing electronically filed Response was served on the parties listed below by first-class mail, postage-prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

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Dated this 9th day of August, 2022.

/s/ James W. Amos
JAMES W. AMOS